

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

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**IN RE:**

**FTZ NETWORKS, INC.**

**CASE NO. 16-14020-JDW**

**DEBTOR-IN-POSSESSION**

**CHAPTER 11**

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**RESPONSE BY FTZ NETWORKS, INC.  
TO EMERGENCY MOTION FOR RELIEF FROM THE AUTOMATIC STAY, TO DEEM  
LEASE REJECTED, AND FOR EXPEDITED HEARING BY PROLOGIS**

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**COMES NOW** Debtor FTZ Networks, Inc. (“Debtor”), and files this response to the motion filed February 18, 2017 by Prologis (“Creditor”) titled “Emergency Motion for Relief from the Automatic Stay, To Deem Lease Rejected, and for Expedited Hearing ” and would state as follows:

1. The Debtor filed a Chapter 11 petition for relief on November 14, 2016 under the U.S. Bankruptcy Code and an order of relief was granted on same day.
2. The Debtor pursuant to 11 U.S.C. 1108 remains in possession of all their property and there has been no Chapter 11 Trustee appointed in this case nor appointment of an Unsecured Creditor’s Committee.
3. The Debtor has been attempting to reorganize and find investor or partner to continue operation in the leased property managed or owned by Creditor.
4. The Debtor was unable to pay the February 1, 2017 rent as ordered by the Court. While the Debtor labelled the reduction in taxes as a “tax refund”, the taxes will be still rebated or reduced by the County. The Debtor paid taxes in their lease payments based on the increased amount before the exemption by DeSoto County which was granted through their efforts and not any effort of Creditor. When taxes are paid by Creditor to DeSoto County they will receive that benefit.

5. The Debtor has not found an investor and is vacating the building and will have all customer's inventory and assets removed no later than Monday, March 13, 2017, if not earlier. The Debtor for their customers did not want to have any customer property improperly disposed of and made arrangements for removal. Creditor will not have expense of removing all the inventory from the premises which is a vast space.

WHEREFORE, Debtor and counsel for Debtor file this response to the motion of creditor as stated above and for such other and further relief as is just in these matters.

Respectfully submitted,  
/s/ Toni Campbell Parker  
Toni Campbell Parker, MS#4018  
Attorney for Debtors  
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Memphis, TN 38124-0666  
901-683-0099  
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#### CERTIFICATE OF SERVICE

I certify that I have, on this day filed the above and foregoing Response to the "Emergency Motion for Relief from the Automatic Stay, to Deem Lease Rejected, and for Expedited Hearing", with the Clerk of this Court using the CM/ECF system, which automatically sent email notification of such filing to the following attorneys of record:

Christopher H. Meredith  
Attorney for Prologis  
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45 N. BB King Blvd., Ste. 201  
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U.S. Trustee  
501 East Court St., Suite 6-430  
Jackson, MS 39201  
This the 9th day of March, 2017

/s/ Toni Campbell Parker  
Toni Campbell Parker